

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW HAMPSHIRE**

COALITION FOR OPEN DEMOCRACY,
et al.,

Plaintiffs,

v.

DAVID M. SCANLAN, in his official capacity
as New Hampshire Secretary of State, *et al.*,

Defendants.

Case No. 1:24-cv-00312-SE-TSM

**DEFENDANTS' ASSENTED-TO MOTION TO EXTEND TIME TO
OBJECT TO PLAINTIFFS' MOTION TO COMPEL**

NOW COME Defendants New Hampshire Secretary of State David M. Scanlan and New Hampshire Attorney General John M. Formella (collectively, the “Defendants”), by and through their counsel, the Office of the Attorney General, and move to extend their deadline to object to Plaintiffs’ Motion to Compel (ECF No. 92), and state as follows:

1. On July 25, 2025, Plaintiffs filed a Motion to Compel Responsive Documents, seeking expedited treatment. ECF No. 92.
2. At the July 24, 2025 status conference, the Court ordered Defendants to file any objection to Plaintiffs’ then-forthcoming Motion to Compel within five days of the Plaintiffs’ Motion. End. Order (July 28, 2025). By Endorsed Order on July 28, 2025, the Court confirmed that Defendants must file any objection on or before July 30, 2025. *Id.*
3. Given the subject matter, relief requested, and importance of the issues that Defendants will raise in their Objection, and considering undersigned counsel’s discovery obligations directly related to the relief requested in Plaintiffs’ Motion, the parties’ ongoing

cooperative efforts to facilitate discovery in this case, and undersigned counsel's workload, Defendants seek additional time to file their Objection to Plaintiffs' Motion to Compel.

4. Accordingly, Defendants respectfully request that the Court extend the deadline to file their Objection by two days, to August 1, 2025.

5. Local Rule 7.1(a)(2): Due to the nature of the relief requested, no memorandum of law is required.

6. Local Rule 7.1(c): Plaintiffs assent to Defendants' request for an additional two days to file their Objection.

7. Local Rule 7.2(a): Neither this Motion nor its requested relief will result in the continuance of any currently scheduled trial or hearing.

Prayer for Relief

WHEREFORE, Secretary of State Scanlan and Attorney General Formella respectfully request that this Honorable Court:

- A. Grant this Motion;
- B. Extend Defendants' deadline to object to the Motion to Compel to August 1, 2025; and
- C. Grant such further relief as is just and equitable.

Respectfully submitted,

DEFENDANTS DAVID M. SCANLAN, in his official capacity as New Hampshire Secretary of State and JOHN M. FORMELLA, in his official capacity as New Hampshire Attorney General

By their attorney,

JOHN M. FORMELLA
ATTORNEY GENERAL

Date: July 29, 2025

/s/ Michael P. DeGrandis
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all parties of record through the Court's e-filing system.

/s/ Michael P. DeGrandis
Michael P. DeGrandis